



U.S. Department  
Of Transportation  
**Pipeline and  
Hazardous Materials  
Safety Administration**

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
**609.989.2171**

## NOTICE OF AMENDMENT

### **OVERNIGHT EXPRESS DELIVERY**

March 6, 2014

Mr. Joe R. Neave  
VP, Safety and Regulatory Compliance  
Transcontinental Gas Pipe Line Company  
2800 Post Oak Blvd  
Houston, TX 77056

**CPF 1-2014-1003M**

Dear Mr. Neave:

On May 31, 2013, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code investigated an incident that occurred at the Transcontinental Gas Pipeline's (TRANSCO), Neshanic Station 505 facility, located in located in Neshanic Station, New Jersey.

The incident occurred on May 30, 2013, during maintenance work to install a new valve and tee section of piping at the station as part of the Northeast Supply Link Modification project

The contractor crew was in the pre-heat phase of welding a 30-inch diameter cap onto a section of pipe when the incident occurred. The cause of the incident was an accumulation of a combustible mixture of vapor inside the pipe that was ignited by the heat from a propane torch being used to preheat the pipe prior to welding. The resulting ignition blew the 30-inch diameter cap from the external welding clamps securing it to the pipe.

On the basis of the investigation, PHMSA has identified the apparent inadequacies found within TRANSCO's plans or procedures, as described below:

- 1. §192.605(b)(1) Procedural manual for operations, maintenance, and emergencies**
  - (a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations.**
  - (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
    - (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.**

TRANSCO's procedures for maintaining the pipeline were inadequate in that they failed to provide guidance for performing gas or electric welding or cutting on pipe when there may be a combustible mixture of vapor inside the pipe in accordance with 192.751(b), Prevention of Accidental Ignition.

Section 192.751(b) requires that: "each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following: Gas or electric welding or cutting may not be performed on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work."

Specifically, TRANSCO's procedures did not provide guidance on minimizing the danger of accidental ignition when liquids have been identified in the pipeline.

As part of the investigation, PHMSA reviewed TRANSCO's WilsOP Gas Handling Plan Form (O&M 10.22.02), dated May 28, 2013. This form was prepared specifically for the "Northeast Supply Link Station 505 Yard Caldwell "B" Line Outage" project and on Page 4 it identified "potential safety hazards that shall be addressed in the work plan or gas handling plan" as follows:

1. Unreliable isolation or purging due to leaking valves, trapped gases or liquids, or pressure buildup
2. Liquids or sludge in pipeline requiring spill containment and ignition control

TRANSCO was unable to provide any procedures providing guidance regarding ignition control when liquids have been identified.

In addition, procedure 90.52.01 (Hot Cutting the Pipeline) Paragraph 1.6 requires that "If fluids are present and it is determined that their presence interferes with the cutting operation, remove the fluids. . .". The procedure does not provide details on how to remove or handle the liquids to prevent ignition.

### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that TRANSCO maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to

CPF 1-2014-1003M on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to [Byron.Coy@dot.gov](mailto:Byron.Coy@dot.gov). Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,



Byron E. Coy  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*